

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

| | | |
|-------------------------------------|---|----------------------|
| CHICAGO AREA JOINT WELFARE |) | |
| COMMITTEE FOR THE POINTING, |) | |
| CLEANING AND CAULKING |) | |
| INDUSTRY, LOCAL 52, <i>et al.</i> , |) | CIVIL ACTION |
| |) | |
| Plaintiffs, |) | NO. 08 C 6758 |
| |) | |
| v. |) | JUDGE RUBEN CASTILLO |
| |) | |
| RAMIREZ CONSTRUCTION COMPANY, |) | |
| an Illinois corporation, |) | |
| |) | |
| Defendant. |) | |

MOTION FOR ENTRY OF JUDGMENT

Plaintiffs, by and through their attorneys, default having been entered against the Defendant on March 3, 2009, request this Court enter judgment against Defendant, RAMIREZ CONSTRUCTION COMPANY, an Illinois corporation. In support of that Motion, Plaintiffs state:

1. On December 3, 2008, this Court ordered the Defendant to submit to an audit of its payroll books and records for the time period January 1, 2006 forward.
2. On March 3, 2009, this Court entered default against Defendant.
3. The revised audit findings show that the Defendant is delinquent in contributions to the Funds in the amount of \$47,357.64. (See Affidavit of Terry Rocco).
4. Additionally, the amount of \$9,471.53 is due for liquidated damages and \$13,976.92 is due for interest. (Rocco Aff. Par. 5). Plaintiffs' auditing firm of Cygan Hayes, Ltd. charged Plaintiffs \$10,604.69 to perform the audit examination and complete the report (Rocco Aff. Par. 6).

5. In addition, Plaintiffs' firm has incurred costs in the amount of \$1,007.56 and attorneys' fees in the amount of \$22,074.00 for a total of \$23,081.56. (See Affidavit of Catherine M. Chapman).

6. Plaintiffs request entry of judgment in the total amount of \$104,492.34.

WHEREFORE, Plaintiffs respectfully request this Court to enter judgment in the amount of \$104,492.34.

/s/ Jennifer L. Dunitz-Geiringer

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CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion for Entry of Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 23rd day of November 2011:

Mr. Eric Brummett, Registered Agent/President
Ramirez Construction Company
2015 W. Fullerton Avenue
Chicago, IL 60647

/s/ Jennifer L. Dunitz-Geiringer

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